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JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

- against -

MARK L. FREYBERG, individually and
conducting business under the name of
THE FREYBERG LAW GROUP,

Defendant.

Case No.: 14-CV-6851 (RMB) (SN)

NOTICE OF MOTION

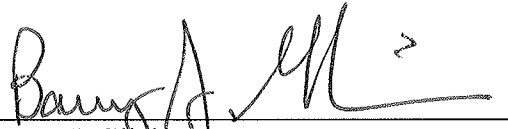
TAKE NOTICE, that upon the Declaration of Barry J. Glickman, dated May 27, 2015, and the exhibits thereto, the Statement pursuant to Local Rule 56.1, the accompanying Memorandum of Law and all pleadings and proceedings heretofore had herein, defendant JPMorgan Chase Bank, N.A. ("Chase") shall make a motion before the Honorable Richard M. Berman, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure:

1. awarding summary judgment on its Complaint dated August 22, 2014;
2. dismissing defendant's Answer and Counterclaims dated November 4, 2014, with prejudice; and
3. for such other and further relief as is just and proper.

Dated: New York, New York
May 27, 2015

Respectfully submitted,

ZEICHNER ELLMAN & KRAUSE LLP

By: 
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TO: NEUFELD & O'LEARY
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